

REMARKS

Claims 1-20 are currently pending in this application.

Claim Rejections

Claims 1-3, 5 and 7-9

Claims 1-3, 5 and 7-9 stand rejected under 35 U.S.C. §102(b) as being anticipated by Taliaferro (U.S. Patent No. 438,364). Applicant respectfully traverses this rejection.

Claim 1 recites providing a first punch operable to perform a first forging work to mold a first opening and a second punch operable to perform a second forging work to mold a second opening. The Examiner asserts that Taliaferro teaches a first punch B and a second punch E (*see* Figs. 2-4). However, as shown in Figs. 2-4, the alleged Taliaferro punches B, E merely bend the work F. Neither of the punches mold an opening in the work F. Accordingly, the Taliaferro punches do not meet the claimed punches and claim 1 is allowable over Taliaferro.

Applicant submits that claim 7 is allowable at least for reasons similar to those given with respect to claim 1.

Claims 2, 3 and 5 depend from claim 1 and claims 8 and 9 depend from claim 7. Accordingly, claims 2, 3, 5, 8 and 9 are allowable at least by virtue of their respective dependencies.

Claims 14 and 20

Claims 14 and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Taliaferro. Claims 14 and 20 depend from claim 7. Even if, for the sake of argument alone, it would have been obvious to modify Taliaferro as suggested by the Examiner, the deficiencies of

Taliaferro discussed above with respect to claim 7 still would not be corrected. Accordingly, claims 14 and 20 are allowable at least by virtue of their dependency from claim 7.

Claims 17 and 18

Claims 17 and 18 stand rejected under 35 U.S.C. §102(b) as being anticipated by either one of Williamson (U.S. Patent No. 2,954,068) or Baldwin (U.S. Patent No. 3,650,142). Applicant respectfully traverses this rejection.

Claim 17 recites providing a first punch operable to perform a first forging work to mold a first opening in a plate member and providing a second punch operable to perform a second forging work to mold a second opening in a plate member. Claim 17 also recites that a shape of the first opening is different from a shape of the second opening. The Examiner cites Williamson and Baldwin individually against claim 17. However, neither of these references teaches providing punches to mold a first opening with a shape that is different than the shape of a second opening as claimed.

With respect to the rejection based on Williamson, the Examiner asserts that element 12 constitutes a first punch and element 14 or 16 constitutes a second punch. However, as shown in Williamson, these punches do not mold openings with different shapes as claimed. With regard to Baldwin, the Examiner asserts that element 73 constitutes a first punch and element 87 constitutes a second punch. However, these alleged punches also do not mold openings with different shape (*see* Figs. 7 and 8). In view of the above, Applicants submit that both Williamson and Baldwin fail to disclose every element of the claim 17 and that claim 17 is therefore allowable over Williamson and Baldwin. Applicants also submit that claim 18 is also allowable at least for reasons similar to those given with respect to claim 17.

Allowable Subject Matter

Applicants thank the Examiner for indicating that claims 6 and 10 are allowed and that claims 4, 11-13, 15 and 19 contain allowable subject matter. Applicant notes that claim 19 depends from claim 6, and therefore the objection to claim 19 appears to be an error. Also, because Applicants believe that the rejection of the corresponding base claims are believed to be overcome, Applicants have not placed claims 4, 11-13, 15 and 19 in independent form at this time.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: May 1, 2006


Stephen R. Valancius
Registration No. 57,574